

JMH:GMR
F. #2023R00263

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(18 U.S.C. §§ 2251(a)(1))

JOREL FOWLER,

Case No. 23-MJ-395

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MICHAEL BUSCEMI, being duly sworn, deposes and states that he is an Special Agent with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about February 18, 2023, within the Eastern District of New York and elsewhere, the defendant JOREL FOWLER did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, knowing and having reason to know that such visual depictions would be transported and transmitted using any means and facility of interstate and foreign commerce and which would be in and affecting interstate and foreign commerce, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, and which visual depictions were

actually transported and transmitted using a means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

(Title 18, United States Code, Section 2251(a)(1))

The source of your deponent's information and the grounds for his/her belief are as follows:¹

1. I am an Special Agent with the Federal Bureau of Investigation ("FBI") and have been for approximately nine years. I am a member of the Violent Crimes Against Children and Human Trafficking Task Force, which investigates individuals suspected of being involved in the receipt, distribution, possession and production of child pornography and sex trafficking, among other offenses. I have been assigned to investigate violations of criminal law relating to sexual offenses, and I have gained expertise in how to conduct such investigations through, among other things, training I have received in seminars and classes, and my daily work in relation to these types of investigations. Through my experience, I have become familiar with the manner in which acts of sexual exploitation of minors are committed and with the behavior of individuals who collect and view child pornography. As part of my responsibilities, I have reviewed thousands of images depicting children (less than eighteen years of age) being sexually exploited by adults. Through my experience in these investigations, I have become familiar with methods of determining whether a child is a minor.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

2. I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

3. The FBI has been investigating the coercion and enticement of minors by the defendant JOREL FOWLER using electronic devices and electronic media. As described below, FOWLER has communicated with minors using the internet and social media and requested and received nude images of the minors.

4. On or about February 18, 2023, the Fairfax County Virginia Police Department ("FCPD") was contacted by Individual-1, the mother of Jane Doe-1, a minor female less than 18 years of age. The identifies of Individual-1 and Jane Doe-1 are known to your affiant. Individual-1 told FCPD that she had observed Jane Doe-1 using an iPad and that Jane Doe-1 had sent nude images of Jane Doe-1 to another person. Jane Doe-1 stated that she believed this other person to be a young boy who had told her his name was "Lev" and he was 15 years old. Jane Doe-1 told the FCPD that she had met "Lev" while playing the online video game Roblox in January 2023. As described more fully below, there is probable cause to believe that the individual who identified himself to Jane Doe-1 as "Lev" is the defendant, JOREL FOWLER.

5. After meeting FOWLER through Roblox, Jane Doe-1 began to communicate with him through Snapchat, the social media and instant messaging application. Jane Doe-1 told FOWLER that she was 13 years old. FOWLER requested that Jane Doe-1 send him images of herself without her shirt on and Jane Doe-1 sent such pictures on multiple occasions. Jane Doe-1 asked FOWLER to send a picture of his face to

Jane Doe-1 and FOWLER complied and requested more pictures of Jane Doe-1. Jane Doe-1 told the FCPD that she had sent pictures depicting herself fully nude and pictures depicting her naked breasts to FOWLER.

6. Members of the FCPD examined the iPad used by Jane Doe-1 to communicate with FOWLER and observed the Snapchat username of the person whom Jane Doe-1 was in communication and who identified himself as “Lev.” The FCPD also examined the picture sent by “Lev” to Jane Doe-1 and observed that the person in the picture appeared to be a 25 to 35 year-old black male. I have observed this image and observed that it is a picture of the defendant, JOREL FOWLER.

7. The FCPD also observed that in some of the pictures sent by Jane Doe-1 to FOWLER Jane Doe-1 is exposing Jane Doe-1’s naked breasts and in other pictures Jane Doe-1 is fully nude with her genitals exposed. Given the appearance of Jane Doe-1’s face in these images, an observer would know that Jane Doe-1 is under 18 years old.

8. Records provided by Snapchat for the account used by FOWLER reflect that the account is associated with a phone number ending in 8017 (the “8017 Number”) and a listed subscriber name of Levarr Wooz. Records maintained by the New York State Department of Motor Vehicles reflect that “Levarr” is FOWLER’s middle name. A search of records associated with the New York State Sex Offender Registry reveals that the 8017 Number belongs to FOWLER and that FOWLER lives in the Eastern District of New York.

9. Records provided by Snapchat also reflect that the internet protocol addresses used to access the account used by FOWLER primarily correspond to locations within the Eastern District of New York. Subscriber records provided by Charter

Communications for the IP address used to access the Snapchat account in February 2023 state that FOWLER is the listed internet subscriber, and that service is provided at FOWLER's home address in Queens, New York.

10. In connection with the FBI's investigation, and pursuant to a search warrant, Snapchat provided records for FOWLER's account. Although a review of these records is still ongoing, the FBI has observed that these records reflect numerous conversations between FOWLER and individuals who appear to be minors. These records also contain multiple images and videos depicting individuals with whom FOWLER was in contact via Snapchat. These images and videos depict these individuals in the nude and the individuals appear to be minors. Several of the videos sent by these individuals to FOWLER depict the sending individuals engaged in masturbation. In several of the conversations between FOWLER and these individuals, FOWLER coaches the individuals about how to masturbate and requests specific nude images and videos of their bodies.

11. The following are examples of messages sent by FOWLER to one victim under 18 years of age:

- "Take off your shirt please"
- "Make me a video"
- "Ima teach you how to do a better pic of your pussy"

12. In connection with the execution of a search warrant at the defendant's residence earlier today the FBI recovered multiple electronic devices from the defendant's residence. Upon initial review pursuant to the search warrant, agents observed large amounts of child pornography on at least one of the devices. One of the devices also

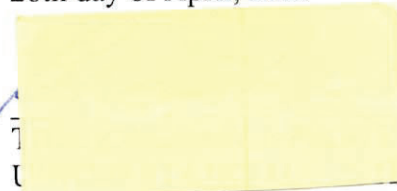
contained the Snapchat account mentioned above which the defendant used to communicate with minor victims. The defendant admitted to agents that child pornography was present on his devices.

WHEREFORE, your deponent respectfully requests that the defendant JOREL FOWLER, be dealt with according to law.



MICHAEL BUSCEMI
Special Agent, Federal Bureau of Investigation

Sworn to before me this
26th day of April, 2023



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KURO
ATE JUDGE
EASTERN DISTRICT OF NEW YORK